

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Danielle L. Robinson

Debtor

**JPMC Specialty Mortgage LLC f/k/a WM Specialty
Mortgage LLC**

Movant

vs.

Danielle L. Robinson

Respondent

BK NO. 16-18372 JKF

Chapter 13

Hearing Date: 02/09/17

**OBJECTION OF JPMC SPECIALTY MORTGAGE LLC F/K/A WM SPECIALTY
MORTGAGE LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

JPMC Specialty Mortgage LLC f/k/a WM Specialty Mortgage LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Arrears are estimated to be \$16,290.25, as will be shown on the POC that will be filed by the Bar date established by this court.
2. Debtor's Plan provides for payment in the amount of \$11,039.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$5,251.25, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, JPMC Specialty Mortgage LLC f/k/a WM Specialty Mortgage LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: December 23, 2016

/s/ Brian C. Nicholas, Esquire
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